

MKM:MEG/KDE  
F. #2016R001111

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

INDICTMENT

- against -

RENEE BELARDO,  
also known as "Tash,"  
ANTHONY BROWN,  
also known as "Mus,"  
TYRIEK HANKINS,  
also known as "Teezy,"  
RONALD JACKSON,  
also known as "G.O.," "God" and "Gotti,"  
ANTHONY KEITT,  
also known as "Dugz,"  
DIMAS PEREZ,  
also known as "Ati,"  
RAFAEL PEREZ,  
also known as "Ralphie,"  
ISIAH SADLER,  
also known as "Ike,"  
CHERENA SWAIN,  
also known as "Reenie," and  
MICHAEL VAILES,  
also known as "Bullet," "Slate" and "Slime,"

Cr. No. \_\_\_\_\_  
(T. 21, U.S.C., §§ 841(b)(1)(A)(iii),  
841(b)(1)(B)(ii)(II), 846, 853(a) and  
853(p); T. 18, U.S.C., §§ 3551 et seq.)

Defendants.

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THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Distribute and Possess With Intent to Distribute Cocaine and Cocaine Base)

1. In or about and between December 2015 and May 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the

defendants RENEE BELARDO, also known as "Tash," ANTHONY BROWN, also known as "Mus," TYRIEK HANKINS, also known as "Teezy," RONALD JACKSON, also known as "G.O.," "God" and "Gotti," ANTHONY KEITT, also known as "Dugz," DIMAS PEREZ, also known as "Ati," RAFAEL PEREZ, also known as "Ralphie," ISIAH SADLER, also known as "Ike," CHERENA SWAIN, also known as "Reenie," and MICHAEL VAILES, also known as "Bullet," "Slate" and "Slime," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute one or more controlled substances, which offense involved (1) a substance containing cocaine, a schedule II controlled substance, and (2) a substance containing cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Section 841(a)(1). The amount of controlled substances involved in the conspiracy attributable to defendants BROWN, SADLER, HANKINS, KEITT, VAILES, DIMAS PEREZ and JACKSON as a result of their own conduct, and the conduct of others reasonably foreseeable to them, was 500 grams or more of a substance containing cocaine and 280 grams or more of a substance containing cocaine base.

(Title 21, United States Code, Sections 846, 841(b)(1)(A)(iii) and 841(b)(1)(B)(ii)(II); Title 18, United States Code, Sections 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION**

2. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds

obtained, directly or indirectly, as a result of such offense, and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

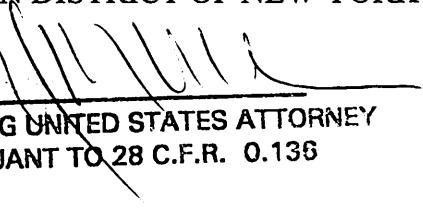
A TRUE BILL

*Robert L. Capers*

\_\_\_\_\_  
FOREPERSON

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ROBERT L. CAPERS  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

BY:   
ACTING UNITED STATES ATTORNEY  
PURSUANT TO 28 C.F.R. 0.136

No.

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

*vs.*

RENEE BELARDO, also known as "Tash," ANTHONY BROWN, also known as "Mus," TYRIEK HANKINS, also known as "Teezy," RONALD JACKSON, also known as "G.O.," "God" and "Gotti," ANTHONY KEITT, also known as "Dugz," DIMAS PEREZ, also known as "Ati," RAFAEL PEREZ, also known as "Ralphie," ISIAH SADLER, also known as "Ike," CHERENA SWAIN, also known as "Reenie," MICHAEL VAILES, also known as "Bullet," "Slate" and "Slime,"

Defendants.

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**INDICTMENT**

(T. 21, U.S.C., §§ 841(b)(1)(A)(iii), 841(b)(1)(B)(ii)(II),  
846, 853(a) and 853(p))

*A true bill.* \_\_\_\_\_

*Robert Neffena*

*Foreperson*

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*Filed in open court this \_\_\_\_\_ day,*

*of \_\_\_\_\_ A.D. 20 \_\_\_\_\_*

*Clerk*

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*Bail, \$ \_\_\_\_\_*

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*Margaret E. Gandy & Andrey Spektor, Assistant U.S. Attorneys, (718) 254-6213/6475*